Good evening – my name is Irene Holtzman and I am the Executive Director of FOCUS. We protect and empower the charter school sector in Washington, DC by advocating for and strengthening autonomy, equity, and quality. On a personal note, I've been working in public education in DC since the year 2000 and have served as a teacher in both sectors, as well as a district administrator.

For those who follow our work, it will not be surprising that I first refer back to the School Reform Act (SRA) in evaluating the proposed Enrollment Ceiling Increase policy. The SRA addresses this in the powers and duties afforded to eligible chartering authorities: monitor school operations, ensure that schools comply with applicable laws and their charter, monitor progress in meeting student academic achievement expectations outlined in the charter, and ensure that each public charter school complies with the annual reporting requirement outlined in the law. In addition, the SRA states that revisions to a school's charter be subject to the same approval requirements as the initial charter petition.

When we look at the proposed policy – the requirements far outstrip anything ever imagined by the SRA. In addition to academic achievement outcomes that may or may not be aligned with a school's actual charter goals, there are also requirements for community engagement, re-enrollment, discipline, and other metrics that are clearly not student achievement based.

I understand that in a vacuum, this is not a compelling argument for changing the policy in any way. It's clear that the board values these inputs and outcomes and wants to center its authorizing on best practices, whether or not the legal authority to do so exists. So, let's think about the practical implications.

When running the data for who would be permitted to increase their enrollment ceiling under this policy, it is highly correlated with the proportion of at-risk students a school serves. Nearly 70% of schools with an at-risk population below 40% would eligible, while only 5% of schools serving at-risk populations above 60% would be eligible. When we think of the mission, meaning, and purpose for many

of our schools, we know that they exist to provide high quality educational options for those most under-served and disenfranchised by the system.

If we create policies that ultimately favor schools serving few at-risk students and that limit the expansion of schools serving greater proportions of at-risk students are we really delivering on the promise of closing the opportunity gap for all students in the District?

On a positive note, I know that I speak for many schools when I say that I appreciate the open-minded and deliberative work of the staff in developing this policy. While I don't think we've reached the right place yet, we have made progress over the past several months. A number of charters have signed onto a letter that makes a few concrete suggestions for improving the policy. I'll briefly mention them here as food for thought.

1. Adjust the PMF bar for single-site LEAs to be considered for an enrollment ceiling increase. Categorically excluding high Tier 2 schools suggests a level of PMF precision which may not be true and does not align with PCSB's public stance on high Tier 2 schools being "good" schools. One possible compromise is to allow high Tier 2 schools that also meet the "gap closing" criteria in the policy to expand. Another possibility is using an additional criteria (such as Empower K12's Bold Performance standard) to allow PCSB to consider allowing Tier 2 schools to expand.
2. Seriously consider altering or removing the re-enrollment rate as a criterion. It is already captured in the PMF and has the strongest correlation with a school's at-risk population. While the research is clear on the impact of mobility on an individual student, it is not a given that school practices are the largest driver of student re-enrollment, particularly in a choice rich environment like Washington, DC.

As always, we appreciate the Board's consideration and are happy to answer any questions you may have.